

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

Equilon Pipeline Company, LLC -
Patoka Terminal
Attn: Bob Williams
P.O. Box 2099, Room TSP-1593
Houston, Texas 77252-2099

Application No.: 95080174

ID No.: 121810AAA

Applicant's Designation:

Date Received: August 21, 1995

Operation of: Pipe line breakout station

Date Issued: February 4, 2002

Expiration Date²: February 4, 2007

Source Location: 1643 Dickie Pond Road, Patoka, Marion County

Responsible Official: R.J. Van Laere, Region Manager

This permit is hereby granted to the above-designated Permittee to operate a pipe line breakout station, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Ernest Wallace at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:EEW:psj

cc: Illinois EPA, FOS, Region 3
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Equilon Pipeline Company, LLC - Pakota Terminal
1643 Dickie Pond Road
Patoka, Illinois 62875
618/432-5730

I.D. No.: 121810AAA
Standard Industrial Classification: 4612, Crude Petroleum Pipe
Lines (Primary)

1.2 Owner/Parent Company

Equilon Pipeline Company, LLC
P.O. Box 2099, Room TSP-1593
Houston, Texas 77252-2099

1.3 Operator

Equilon Pipeline Company, LLC
P.O. Box 2099, Room TSP-1593
Houston, Texas 77252-2099

Bob Williams
713/241-1964

1.4 General Source Description

The Equilon Pipeline Company, LLC - Patoka Terminal is located two miles northeast of Patoka, in Patoka Township. The source is a breakout station for crude oil. Materials being transferred by pipe line may be temporarily stored at the source depending on the schedule of the pipe line for shipment of material to different destinations.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

| | |
|------------------|--|
| acfm | actual cubic feet per minute |
| ACMA | Alternative Compliance Market Account |
| Act | Illinois Environmental Protection Act [415 ILCS 5/1 et seq.] |
| AP-42 | Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711 |
| ATU | Allotment Trading Unit |
| Btu | British thermal unit |
| CAA | Clean Air Act [42 U.S.C. Section 7401 et seq.] |
| CAAPP | Clean Air Act Permit Program |
| CAM | Compliance Assurance Monitoring |
| CFR | Code of Federal Regulations |
| cm | centimeter |
| cm ² | square centimeter |
| ERMS | Emissions Reduction Market System |
| °F | degrees Fahrenheit |
| ft ³ | cubic foot |
| HAP | Hazardous Air Pollutant |
| hr | hour |
| IAC | Illinois Administrative Code |
| I.D. No. | Identification Number of Source, assigned by Illinois EPA |
| ILCS | Illinois Compiled Statutes |
| Illinois EPA | Illinois Environmental Protection Agency |
| in | inch |
| in ² | square inch |
| °K | degrees Kelvin |
| kPa | kiloPascals |
| kW | kilowatts |
| lb | pound |
| m | meter |
| m ³ | cubic meter |
| mmBtu | Million British thermal units |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NO _x | Nitrogen Oxides |
| NSPS | New Source Performance Standards |
| OM | Organic Material |
| PM | Particulate Matter |
| PM ₁₀ | Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods |
| ppm | parts per million |
| PSD | Prevention of Significant Deterioration |
| psi | pounds per square inch |
| psia | pounds per square inch absolute |
| RMP | Risk Management Plan |
| SIC | Standard Industrial Classification |

| | |
|-----------------|---|
| SO ₂ | Sulfur Dioxide |
| TANKS | USEPA Emission Estimating Program for Storage Tanks |
| T1 | Title I - identifies Title I conditions that have been carried over from an existing permit |
| T1N | Title I New - identifies Title I conditions that are being established in this permit |
| T1R | Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit |
| USEPA | United States Environmental Protection Agency |
| VOC | Volatile Organic Compounds |
| VOL | Volatile Organic Liquid |
| VOM | Volatile Organic Material |
| VPL | Volatile Petroleum Liquid |
| wt | weight |
| yr | year |

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Emergency generators with power output less than 150 horsepower

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour

or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

| Emission Unit | Description | Emission Control Equipment |
|--|--|--|
| Group 1 Storage Tanks (See Attachment 1 for details) | Existing external floating roof storage tanks that require a primary seal and do not require a rim mounted secondary seal because they are used to store crude oil | Floating roof with shoe mounted primary seal |
| Group 2 Storage Tanks (See Attachment 1 for details) | New external floating roof storage tanks (constructed after June 11, 1973 and prior to May 19, 1978) | Floating roof |
| Fugitive emissions | Piping, valves, and pumps used to transfer materials between the pipe line and storage tanks | None |

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.
- 5.1.3 For purposes of the CAAPP and Title I of the CAA, Shell Pipe Line Corporation is considered a single source with Equilon Pipeline Company, LLC, I.D. No. 121810AAD, located at 1249 Dickey Pond Road in Vernon, IL. The source has elected to obtain separate CAAPP permits for these locations.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Condition 7.0 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 25 miles per hour (40 kilometers per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.
 - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

5.2.5 Other Applicable Regulations

- a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.3 Non-Applicability of Regulations of Concern

5.3.1 This permit is issued based on the source not being subject to 40 CFR Part 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), because the source does not load, transport, or store gasoline, nor is it a major source of HAPs.

5.3.2 This permit is issued based on the source not being subject to 35 IAC Part 218, Subpart Y, Gasoline Distribution, because the source does not load, transport, or store gasoline.

5.4 Source-Wide Operational and Production Limits and Work Practices

The Permittee shall inspect pumps and compressors for leaks on at least a quarterly basis. If a significant leak is detected by any

means, including visual observation, smell or sound, the pump or compressor shall be expeditiously repaired or taken out of service. For this purpose, action shall be considered expeditious if it occurs within 15 days.

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Condition 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding all emission unit emissions. Compliance with these limits shall be determined on a calendar year basis. These limitations are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

| Pollutant | Tons/Year |
|------------------------------------|-----------|
| Volatile Organic Material (VOM) | 351.52 |
| Sulfur Dioxide (SO ₂) | --- |
| Particulate Matter (PM) | --- |
| Nitrogen Oxides (NO _x) | --- |
| HAP, not included in VOM or PM | --- |
| TOTAL | 351.52 |

5.5.2 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Condition 7.0 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 General Records for Storage Tanks

- a. The Permittee shall maintain a log identifying which unit-specific condition (Condition 7.1 or 7.2 of this permit) each tank is complying with, if different than shown in Attachment 1, with date and supporting explanation for change in applicable requirements, pursuant to Section 39.5(7)(1)(i)(A) of the Act.
- b. The Permittee shall maintain records of the following items for each storage tank at the source with a capacity of 40 m³ (approximately 10,500 gallons) or greater [Section 39.5(7)(b) of the Act]. These records shall be kept up to date for each tank at the source and be retained until the tank is removed from the source.

- i. The date* on which construction of the tank was commenced, with a copy of supporting documentation;
- ii. The date(s)* on which modification or reconstruction, as defined in the NSPS, 40 CFR 60.14 and 60.15 respectively, were commenced on the tank, if applicable;
- iii. A record of the types of VOL actually stored in the tank and anticipated to be stored in the tank, with date of each change in the list; and
- iv. The dimensions of the tank and an analysis of capacity, if the tank was constructed, modified, or reconstructed after July 23, 1984. [40 CFR 60.116b(b)]

* If a date is prior to June 11, 1973, a specific date is not needed and documentation need only show commencement of construction prior to this date.

5.6.2 Records for Floating Roof Storage Tanks

The Permittee shall maintain records of the following items for each storage tank equipped with a floating roof to allow calculation of VOM emissions from the storage tanks at the source so as to demonstrate compliance with the annual emission limits in Condition 5.5. These records shall be updated whenever there is a change in status of a storage tank that is brought about by actions at the source, such as painting, and during periodic inspections.

- a. The color of each storage tank;
- b. The condition of each storage tank; and
- c. The type and number of fittings, or a statement that the default settings regarding type and number of fittings in the TANKS program are used for emission estimation.

5.6.3 Records for VOM Emissions

The Permittee shall maintain records of the following items to quantify annual VOM and HAP emissions, so as to demonstrate compliance with the limits in Condition 5.5 and to verify that the source is not a major source of HAP emissions (therefore not subject to 40 CFR Part 63):

- a. The identification and properties of the worst-case organic liquid stored at the source, as related to emissions, i.e., vapor pressure and molecular weight;
- b. A current analysis of the tank or tanks in each group that would have the greatest emissions from storage of various liquids to the extent that the Permittee does not choose to keep throughput records by individual tank, to identify the tank that should be assumed for emission calculations.

5.6.4 Records for Operating Scenarios

If any storage tank identified in this permit as storing VPL changes to storage of materials with a vapor pressure of less than 0.5 psia at 70°F as provided for in Condition 5.8, the Permittee shall maintain a log identifying the liquid stored in the tank, the date such tank switched to the storage of this liquid, and if applicable, the date such tank returned to storage of VPL.

5.6.5 Records for Pump Seal Leak Inspections

The Permittee shall keep the following records to document implementation of the leak detection and repair program required by Condition 5.4.

- a. Upon the presence of a leak, document date, description, and the means of identification of the leak;
- b. The date the leak was repaired, or the component taken out of service; and
- c. If a corrective action, as in Condition 5.4, was not taken within 15 days, an explanation why corrective action could not be taken in 15 days.

5.6.6 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA, and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

Annual emissions from the source in excess of the emission limits specified in Condition 5.5.1 shall be reported within 30 days of identification of such an occurrence.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

Storage Tanks

- a. The Permittee is authorized to store materials with a vapor pressure less than 0.5 psia at 70°F, e.g., distillate fuel oils or blend stocks, diesel fuel, and jet kerosene, in any storage tank identified in this permit as a VPL storage tank. In such instances, the unit-specific permit conditions in Condition 7.0 of this permit applicable to such tank based on the storage of VPL shall no longer apply. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of an emission unit, as defined in 35 IAC 201.102:
- b. Upon resuming storage of VPL in such a tank, the applicable unit-specific conditions of Condition 7.0 of this permit shall again apply to such tank. In addition, prior to returning such a tank to storage of VPL, the Permittee shall conduct applicable inspection of the tank for storage of VPL.

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating VOM Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7 and the use of USEPA approved emissions estimating guidance.

- a. For the purpose of estimating VOM emissions from the storage tanks, the current version of the TANKS program is acceptable.
- b. For the purpose of estimating fugitive VOM emissions from components at the facility, the 1997 API emission factors for uncontrolled light crude are acceptable.

5.10 Permit Shield

The Permittee is hereby shielded from any obligation to measure the volume of leaking liquid from a pump or compressor for purposes of determining compliance with 35 IAC 215.142 as Condition 5.4 establishes appropriate compliance procedures for this rule that do not rely on such measurements.

6.0 [NOT APPLICABLE TO THIS PERMIT]

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1 Storage Tanks

External floating roof storage tanks constructed before June 11, 1973.

7.1.1 Description

The Permittee operates external floating roof storage tanks that are not required to have a rim mounted secondary seal to store various crude oils. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.1.2 List of Emission Equipment and Pollution Control Equipment

| Storage Tank | Description | Emission Control Equipment |
|--------------|-----------------------------|--|
| 700 | External floating roof tank | Floating roof, liquid-mounted primary seal, and a permanent submerged loading pipe |
| 701 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |
| 702 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |
| 703 | External floating roof tank | Floating roof, liquid-mounted primary seal, and a permanent submerged loading pipe |
| 704 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |
| 712 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |
| 714 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |
| 715 | External floating roof tank | Floating roof, liquid-mounted primary seal, and a permanent submerged loading pipe |
| 716 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |
| 717 | External floating roof tank | Floating roof, liquid-mounted primary seal, and a permanent submerged loading pipe |
| 707 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |

| Storage Tank | Description | Emission Control Equipment |
|--------------|-----------------------------|--|
| 711 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |

7.1.3 Applicability Provisions

- a. An "affected tank," for the purpose of these unit-specific conditions, is a storage tank that is subject to 35 IAC 215.121, 215.122, and 215.123(b). Each storage tank with a capacity of 151.42 cubic meters (approx. 40,000 gallons) or more storing volatile petroleum liquid (VPL) is subject to the requirements of 35 IAC 215.123(b) unless it is specifically excluded pursuant to 35 IAC 215.123(a). A tank may be permanently exempt based on applicability of a NSPS. A tank may also be exempt due to the current service, features, or other circumstances associated with the tank.

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.1.2. The storage tanks in Group 1 are divided into Subgroups based on the reason such tank is exempt from the requirements of 35 IAC 215.124(a). The status of all storage tanks at this source, including affected tanks that are subject to 35 IAC 215.123(b), is summarized in Attachment 1.

- b. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of a floating roof, primary seal, or secondary seal of an affected tank, the Permittee is authorized to continue operation of the tank in violation of the applicable requirement of 35 IAC 215.121 or 215.123, as necessary to prevent risk of injury to personnel or severe damage to equipment. This authorization is subject to the following requirements:

- i. The Permittee shall repair the damaged feature(s) of the storage tank or empty and remove the tank from VPL service as soon as practicable. This shall be accomplished within 45 days unless the feature(s) can not be repaired within 45 days and the storage tank can not be emptied and removed from VPL service within 45 days, and the Permittee obtains an extension, for up to 30 days, from the Illinois EPA. The request for such an extension must document that alternative storage capacity is unavailable and specify a schedule of actions the Permittee will take

that will assure the feature(s) will be repaired or the storage tank emptied as soon as possible.

- ii. The Permittee shall fulfill applicable recordkeeping and reporting requirements of Condition 5.7.1 and 7.1.9.

7.1.4 Non-Applicable Regulations of Concern

This permit is issued based on affected tanks not being subject to the requirements of 35 IAC 215.124(a) because the exemption provisions, as follows, are satisfied. The exemption provisions that affected tanks are relying upon as of the "date issued" of this permit are listed in Condition 7.1.2.

- a. The external floating roof is of welded construction and equipped with a metallic type shoe-mounted secondary seal [35 IAC 215.124(b)(2)]. (Subgroup a)
- b. The external floating roof is of welded construction and equipped with a metallic type shoe seal or a liquid-mounted foam seal, and the tank is only used to store petroleum liquid with a true vapor pressure less than 4.0 psia at 70°F [35 IAC 215.124(b)(3)]. (Subgroup b)
- c. The only VPL the tank is used to store is crude oil [35 IAC 215.124(b)(4)]. (Subgroup c)

7.1.5 Control Requirements

Each affected tank shall be equipped with the following:

- a. A floating roof which rests on the surface of the stored liquid and is equipped with a primary seal [35 IAC 215.121(b)(1)];
- b. All openings of the floating roof deck, other than drains, shall be closed at all times except when supported on the roof legs and be equipped with covers, lids, or seals. [35 IAC 215.123(b)(3)]
- c. A permanent submerged loading pipe. [35 IAC 215.122(b)]

7.1.6 Emission Limitations

There are no specific emission limitations for these units, however, there are source-wide emission limitations in Condition 5.5 that include these units.

7.1.7 Operating Requirements

- a. Each affected tank shall be operated so that the floating roof including the seal closure devices meet each of the following requirements:
 - i. There shall be no visible holes, tears, or other defects in the seal or any seal fabric or material of the floating roof (35 IAC 215.123(b)(2))
 - ii. The covers, lids or seals on openings of the floating roof deck other than stub drains shall be operated such that the following requirements are met:
 - A. The cover, lid or seal is in the closed position at all times except when petroleum liquid is transferred to or from the tank [35 IAC 215.123(b)(3)(A)];
 - B. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports [35 IAC 215.123(b)(3)(B)]; and
 - C. Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [35 IAC 215.123(b)(3)(C)]
- b. No person shall cause or allow the emissions of air contaminants into the atmosphere from any gauging or sampling devices attached to an affected tank, except during sampling or maintenance operations. [35 IAC 215.121(b)(1)]

7.1.8 Inspection Requirements

- a. The Permittee shall inspect each affected tank semiannually to insure compliance with the applicable control and operating requirements. [35 IAC 215.123(b)(4)]
- b. The Permittee shall perform a complete inspection of the cover and seal of each affected tank whenever the tank is degassed for any reasons other than the transfer of liquid during the normal operations of the tank, or whenever repairs are made as a result of any semiannual inspection or incidence of roof damage or defect. [35 IAC 215.123(b)(5)]

7.1.9 Recordkeeping Requirements

- a. The Permittee shall maintain records to identify whenever an affected tank is emptied for any reason other than the transfer of liquid during normal operation or whenever repairs are made as a result of regular inspections or incident of roof damage or defect to demonstrate compliance with Condition 7.1.8 (Cover and Seal Inspections) [35 IAC 215.123(b)(6)].

Results of Cover and Seal Inspections required by Condition 7.1.8(a) and/or (b), shall include:

- i. Type of inspection;
 - ii. When the inspection and/or measurement was performed;
 - iii. Who performed the inspection and/or measurement;
 - iv. The method of inspection and/or measurement;
 - v. The observed condition of each feature of the external floating roof (seals, roof deck and fittings) with raw data recorded during the inspection and/or measurement; and
 - vi. Summary of compliance.
- b. Records for Malfunctions and Breakdowns of Storage Tanks

The Permittee shall maintain records, pursuant to 35 IAC 201.263, of continued operation of an affected storage tank during malfunctions and/or breakdown of the control features of the tank, which as a minimum, shall include:

- i. Occurrence date, duration and date of correction action of malfunction or breakdown;
- ii. A detailed explanation of the malfunction or breakdown;
- iii. An explanation why the damaged feature(s) could not be immediately repaired or the tank emptied and removed from service without risk of injury to personnel or severe damage to equipment;
- iv. The measures used to reduce the quantity of emissions and the duration of the event;

- v. The steps taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity; and
 - vi. The amount of release above typical emissions during malfunction/breakdown.
- c. The Permittee shall maintain records of the following items to demonstrate that affected tanks are not subject to 35 IAC 215.124. [Section 39.5(7)(b) of the Act]
- i. For each affected tank in Subgroup a, as addressed by Condition 7.1.4(a):
 - A. Design information for each tank showing welded roof construction and a metallic type shoe-mounted secondary seal; and
 - B. Maintenance and repair records for each tank as related to these features.
 - ii. For each affected tank in Subgroup b, as addressed by Condition 7.1.4(b):
 - A. Design information for each tank showing welded roof construction and a metallic type shoe seal, a liquid-mounted foam seal, or a liquid mounted liquid filled type seal;
 - B. Maintenance and repair records for each tanks as related to these features; and
 - C. Records of the liquids stored in each tank and its true vapor pressure at 70°F (See also Condition 5.6.2).
 - iii. For each affected tank in Subgroup c, as addressed by Condition 7.1.4(c), records showing that the only VPL stored in each tank is crude oil.
- d. If any storage tank identified in this permit as belonging to a particular Subgroup is changed in such a manner so that it will belong to a different Subgroup as provided in Condition 7.1.11(c) or (d), the Permittee shall maintain a log identifying which Subgroup such tank is operating pursuant to, including the date such tank switched to a different Subgroup.

7.1.10 Reporting Requirements

- a. The Permittee shall notify the Illinois EPA, Compliance Section, and Regional Field Office, at least 30 days before the planned performance of seal gap measurements, so the Illinois EPA may observe the measurements.
- b. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:
 - i. Any storage of VPL in the affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.1.5, (e.g., "no rim-mounted secondary seal"), within five (5) days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance;
 - ii. Any storage of VPL in the affected tank that is not in compliance with the control requirements (Condition 7.1.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance; and
 - iii. The secondary seal gap area, calculated in accordance with Condition 7.1.9(c), in excess of the operating requirements specified in Condition 7.1.7(a)(ii), within 60 days of the date of measurements.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the requirements in Condition 7.1 of this permit.
- b. Changes accounted for in Condition 5.8.
- c. For any affected tank in Subgroup c, which is exempt from the requirements of 35 IAC 215.124(a) because it is storing only crude oil as provided in 35 IAC 215.124(b)(4), the Permittee is authorized to store VPL other than crude oil and remain exempt from the control requirements of 35 IAC 215.124(a) provided the affected tank complies with Condition 7.1.4(c).
- d. For any affected tank in Subgroup b, which is exempt from the requirements of 215.124(a) because it is storing only petroleum liquids with a true vapor pressure less than 4.0 psia at 70°F as provided in 35 IAC 215.124(b)(3), the Permittee is authorized to store crude oil with a true vapor pressure greater than 4.0 psia at 70°F and remain exempt from the control requirements of 35 IAC 215.124(a) provided the affected tank complies with Condition 7.1.4(b).

7.1.12 Compliance Procedures

None

7.2 Group 2 Storage Tanks

External floating roof storage tanks constructed after June 11, 1973 and prior to May 19, 1978.

7.2.1 Description

The Permittee operates new external floating roof storage tank(s) to store various crude oils. Permanent submerged loading must be used at these tanks, minimizing turbulence and evaporation of VOM during loading.

7.2.2 List of Emission Equipment and Pollution Control Equipment

| Storage Tank | Description | Emission Control Equipment |
|--------------|-----------------------------|--|
| 710 | External floating roof tank | Floating roof, liquid-mounted primary seal, and a permanent submerged loading pipe |
| 713 | External floating roof tank | Floating roof, liquid-mounted primary seal, and a permanent submerged loading pipe |
| 718 | External floating roof tank | Floating roof, liquid-mounted primary seal, and a permanent submerged loading pipe |
| 719 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |
| 720 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |
| 722 | External floating roof tank | Floating roof, liquid-mounted primary seal, and a permanent submerged loading pipe |
| 706 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |
| 708 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |
| 709 | External floating roof tank | Floating roof, shoe-mounted primary seal, and a permanent submerged loading pipe |

7.2.3 Applicability Provisions

- a. An "affected tank," for the purposes of these unit specific conditions is a storage tank that is subject to the control requirement of 40 CFR 60 Subpart K that relies on an external floating roof for compliance. A storage tank constructed, reconstructed, or modified after June 11, 1973 and prior to May 19, 1978 with a capacity greater than or equal to 65,000 gallons (245.4 m³), or a storage tank

constructed, reconstructed, or modified after March 8, 1974 and prior to May 19, 1978 with a capacity greater than or equal to 40,000 gallons (151 m³) but not greater than or equal to 65,000 gallons (245.4 m³), is subject to the requirements of 40 CFR 60 Subpart K if it stores a VOL with a maximum true vapor pressure equal to or greater than 78 mm Hg (1.5 psia), but not greater than 570 mm Hg (11.1 psia).

As of the "date issued" as shown on page 1 of this permit, the affected tanks are identified in Condition 7.2.2. The status of all storage tanks at this source, including affected tanks that are subject to 40 CFR 60 Subpart K, is summarized in Attachment 1.

- b. Each storage tank subject to 40 CFR 60 Subpart K is hereby shielded from compliance with 35 IAC 215.121. This shield is issued to streamline the applicable requirements for the source, based on the Illinois EPA's finding that compliance with 40 CFR 60, Subpart K assures compliance with 35 IAC 215.121, following the review of requirements of 40 CFR 60 Subpart K and 35 IAC 215.121.

7.2.4 Non-Applicable Regulations of Concern

N/A

7.2.5 Control Requirements

- a. Each affected tank shall comply with the requirements of 40 CFR 60.112, which requires the use of an external floating roof if the true vapor pressure of the petroleum liquid, as stored, is equal to or greater than 78 mm Hg (1.5 psia) but not greater than 570 mm Hg (11.1 psia).
- b. Each affected tank shall also be equipped with a permanent submerged loading pipe, pursuant to 35 IAC 215.122(b).

7.2.6 Emission Limitations

There are also wide emission limitations in Condition 5.5 that include these affected tanks.

7.2.7 Operating Requirements

None

7.2.8 Inspection Requirements

None

7.2.9 Recordkeeping Requirements

The Permittee shall keep the operating records required by 40 CFR 60.113(a) for each affected tank, as follows:

Records of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.113(a)]

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Any storage of VOL in an affected tank that is not in compliance with the control requirements due to absence of the features required by Condition 7.2.5, e.g., no "floating roof," within five days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps taken to avoid future non-compliance.
- b. Any storage of VOL in an affected tank that is out of compliance with the control requirements (Condition 7.2.5) due to damage, deterioration, or other condition of the tank, within 30 days of becoming aware of the non-compliance status. This notification shall include a description of the event, the cause for the non-compliance, actions taken to correct the non-compliance, and the steps to be taken to avoid future non-compliance.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to an affected tank without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

- a. Changes in the material stored in a tank, provided the tank continues to comply with the specifications in Condition 7.2 of this permit.
- b. Changes accounted for in Condition 5.8.

7.2.12 Compliance Procedures

None

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after October 6, 1997 (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other process, emissions, or composition parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

| <u>Monitoring Period</u> | <u>Report Due Date</u> |
|--------------------------|------------------------|
| January - June | September 1 |
| July - December | March 1 |

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency
Bureau of Air
Compliance Section (MC 40)
P.O. Box 19276
Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule. [Section 39.5(7)(j)(iv) of the Act]

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: Enforcement action, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any air emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition. [Section 39.5(6)(c) of the Act]

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act] The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the facilities.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege. [Section 39.5(7)(o)(iv) of the Act]

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. [Section 39.5(12)(b)(iv) of the Act]

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be

submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certifications shall include descriptions on means to monitor the compliance of the source including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA. [Section 39.5(7)(p)(v)(D) of the Act]
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Action

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted facility was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, limitations, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission sources and control equipment while physically present at the indicated plant location(s). Unless the permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed, notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality. [Section 39.5(7)(o)(v) of the Act]

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal

application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(1), (n) and (o) of the Act]

10.0 ATTACHMENTS

10.1 ATTACHMENT 1 Summary of Storage Tank Features and Groupings

| <u>Group/Tank #</u> | <u>Capacity (Barrels)</u> | <u>Tank Type</u> | <u>Primary Seal</u> | <u>Secondary Seal</u> | <u>Material Stored</u> | <u>Expected Max. Vapor Pressure (psia at 70°F)</u> | <u>Date Constructed</u> |
|---------------------|-------------------------------|------------------------------|------------------------------|---------------------------|----------------------------|--|-----------------------------|
| Group 1 | | | | | | | |
| Tank 700 | 240,000 | External floating roof | Liquid- mounted | None | Crude Oil | 9.6 | 1967 |
| Tank 701 | 240,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1967 |
| Tank 702 | 240,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1967 |
| Tank 703 | 240,000 | External floating roof | Liquid- mounted | None | Crude Oil | 9.6 | 1967 |
| Tank 704 | 240,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1967 |
| Tank 712 | 360,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1971 |
| Tank 714 | 240,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1967 |
| Tank 715 | 120,000 | External floating roof | Liquid- mounted | None | Crude Oil | 9.6 | 1967 |
| Tank 716 | 240,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1967 |
| Tank 717 | 120,000 | External floating roof | Liquid- mounted | None | Crude Oil | 9.6 | 1967 |

| <u>Group/Tank #</u> | <u>Capacity (Barrels)</u> | <u>Tank Type</u> | <u>Primary Seal</u> | <u>Secondary Seal</u> | <u>Material Stored</u> | <u>Expected Max. Vapor Pressure (psia at 70°F)</u> | <u>Date Constructed</u> |
|---------------------|-------------------------------|------------------------------|------------------------------|---------------------------|----------------------------|--|-----------------------------|
| Tank 707 | 268,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1971 |
| Tank 711 | 240,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1972 |
| Group 2 | | | | | | | |
| Tank 710 | 360,000 | External floating roof | Liquid- mounted | None | Crude Oil | 9.6 | 1973 |
| Tank 713 | 360,000 | External floating roof | Liquid- mounted | None | Crude Oil | 9.6 | 1973 |
| Tank 718 | 360,000 | External floating roof | Liquid- mounted | None | Crude Oil | 9.6 | 1974 |
| Tank 719 | 400,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1975 |
| Tank 720 | 400,000 | External floating roof | Shoe- mounted | None | Crude Oil | 9.6 | 1975 |
| Tank 722 | 400,000 | External floating roof | Liquid- mounted | None | Crude Oil | 9.6 | 1975 |
| Tank 706 | 360,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1977 |
| Tank 708 | 360,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1974 |
| Tank 709 | 360,000 | External floating roof | Metallic shoe- mounted | None | Crude Oil | 9.6 | 1975 |

10.2 Attachment 2 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.3 Attachment 3 Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

| | |
|---|----------------------------------|
| Application For Construction Permit (For CAAPP Sources Only) | For Illinois EPA use only |
| | ID number: |
| | Permit number: |
| | Date received: |

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

| Source Information | | |
|--|--------------|--|
| 1. Source name: | | |
| 2. Source street address: | | |
| 3. City: | 4. Zip code: | |
| 5. Is the source located within city limits? | | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 6. Township name: | 7. County: | 8. ID number: |

| Owner Information | | |
|-------------------|------------|---------------|
| 9. Name: | | |
| 10. Address: | | |
| 11. City: | 12. State: | 13. Zip code: |

| Operator Information (if different from owner) | | |
|--|------------|---------------|
| 14. Name | | |
| 15. Address: | | |
| 16. City: | 17. State: | 18. Zip code: |

| Applicant Information | |
|---|--|
| 19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator | 20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source |
| 21. Attention name and/or title for written correspondence: | |
| 22. Technical contact person for application: | 23. Contact person's telephone number: |

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

| Summary Of Application Contents | |
|---------------------------------|--|
| 24. | <p>Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs:</p> <p>a) Non-attainment New Source Review – 35 IAC Part 203;</p> <p>b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21;</p> <p>c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?</p> |
| | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 25. | <p>Does the application identify and address all applicable emissions standards, including those found in the following:</p> <p>a) Board Emission Standards – 35 IAC Chapter I, Subtitle B;</p> <p>b) Federal New Source Performance Standards – 40 CFR Part 60;</p> <p>c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?</p> |
| | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 26. | <p>Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?</p> |
| | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 27. | <p>Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?</p> |
| | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 28. | <p>Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA?</p> <p>Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.</p> |
| | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 29. | <p>If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?</p> |
| | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application |

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

| Signature Block | |
|---|--|
| <p>This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.</p> | |
| <p>30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.</p> <p>Authorized Signature:</p> | |
| <p>BY:</p> | |
| <p>_____</p> <p>AUTHORIZED SIGNATURE</p> | <p>_____</p> <p>TITLE OF SIGNATORY</p> |
| <p>_____</p> <p>TYPED OR PRINTED NAME OF SIGNATORY</p> | <p>_____ / _____ / _____</p> <p>DATE</p> |

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.5 Attachment 5 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. Operations
 - a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

EEW:psj